



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd Floor
New York, New York 10007*

March 8, 2022

BY ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Reclaim the Records, et al. v. USCIS*, No. 21-cv-6397 (MKV)

Dear Judge Vyskocil:

This Office represents the United States Citizenship and Immigration Services (“USCIS”) in connection with the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. The parties jointly write to provide a status update to the Court, as ordered by the Court at the conference held on February 22, 2022. *See* Dkt. No. 15.

As discussed at the February 22, 2022, conference, the only remaining issue in this case is Plaintiffs’ request for attorneys’ fees. Also as discussed at the conference, Plaintiffs were considering whether to make a fee application in this case.

The parties have decided to negotiate fees in good faith in an effort to resolve this issue without the need for Court intervention. The parties respectfully request that they be afforded 30 days to confer and attempt to resolve this issue, which they are optimistic that they will be able to do. Accordingly, the parties respectfully request that, by April 8, 2022, the parties either submit a proposed stipulation and order for the Court’s approval or a letter updating the Court on the status of the parties’ negotiations.

The parties thank the Court for its consideration of this request.

Page 2 of 2

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Alexander J. Hogan
ALEXANDER J. HOGAN
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2799
E-mail: alexander.hogan@usdoj.gov